

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

William A. Newsom,
Plaintiff,

v.

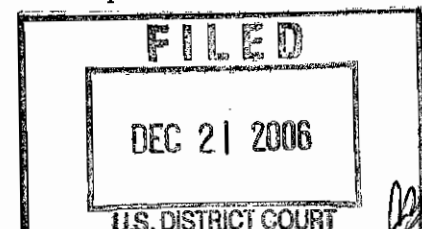
Stanley W. Taylor, et al,
Defendant.

Civil Action No. 05-673 GMS

PLAINTIFF'S DISCOVERY

Plaintiff requests that the defendants First Correctional Medical LLC, disclose all initial information and documents the defendants will use to support its defenses, and serve them upon plaintiff within 30 days pursuant to Fed. R. Civ. P. 26(a)(1)

1. Any and all medical records and x-ray reports of plaintiffs finger in regards to this civil complaint from September 20, 2003 through and including the date of your response to this request.
2. Any and all policies, procedures, regulations, instructions, notes, memorandum, internal communications, electronic messages, and directives in effect from September 20, 2003 through and including the date of your response to this request regarding all of the treatment plaintiff received on his fractured and dislocated finger in regards to this civil complaint.
3. Any notes, documents, letters, memoranda, files, records, record books, logs, grievance reports, grievances, internal messages, electronic messages, directives, or written communications concerning complaints made about or against Dr. Sitta B. Ali and First Correctional Medical by the plaintiff or any other party from September 20, 2003 through and including your response to this request.
4. Any and all certificates, degrees, credentials, and licenses held by Dr. Sitta B. Ali that describes what type of doctor she was, what she was professionally qualified to perform



medically, and which shows she was licensed to practice medicine in the State of Delaware from September 20, 2003 through and including the date of this request.

5. Any and all documents, notes, memoranda, internal communications, electronic messages, contracts, and directives that were issued from September 20, 2003 through and including the date of your response to this request concerning the termination of Dr. Sitta B. Ali's employment with First Correctional Medical, LLC.

6. Any and all policies, procedures, regulations, instructions, and directives in effect from September 20, 2003 through and including the date of your response to this request concerning the screening and employing of any medical staff member of First Correctional Medical, LLC.

7. Any and all documents, agreements, regulations, policies, procedures, internal messages, electronic messages, contracts, and screening procedures in effect from September 20, 2003 through and including the date of your response to this request regarding the Delaware Department of Corrections contracting First Correctional Medical, LLC. to provide medical services to its inmates.

8. Any and all documents, letters, memoranda, internal messages, electronic messages, policies, procedures, and regulations in effect from September 20, 2003 through and including the date of your response to this request concerning the Delaware Department of Corrections terminating its contract with First Correctional Medical, LLC.

9. Any and all policies, procedures, memoranda, and directives in effect from September 20, 2003 through and including the date of response to this request concerning the protocol of how First Correctional Medical, LLC. addresses the medical treatment of an inmate that has been diagnosed for a fractured and dislocated finger by a qualified outside medical provider, specifically, the medical report sent to First Correctional Medical, LLC. concerning the plaintiff needing extensive reconstructive hand surgery on October 17, 2003 by Dr. Stephen G. Manifold (see attached exhibit).

Submitted this 18 day of December, 2006.

William A. Newsom

William A. Newsom
Delaware Correctional Center
1181 Paddock road
Smyrna, DE 19977

3734300

William Newsome—
DOB: 8/10/72

10/17/03 Letter to Dr. Tatagari

CC: Right long finger pain.

HPI: This is a 31-year-old, right hand dominant male who presents after sustaining an injury to his right long finger approximately 4 weeks ago. He states he sustained a fracture and dislocation of the finger. He was initially treated with attempted closed reduction of the finger. He now presents for further evaluation. He continues to have pain and swelling as well as some deformity about the long finger. He denies any numbness or tingling in the finger. He denies any injury to the remaining digits of the hand.

On PE of the right long finger, there is diffuse swelling about the PIP joint. There is diffuse tenderness to palpation over the PIP joint as well. There is no tenderness over the DIP or MCP joints. There is rotatory malalignment noted of the long finger. Sensation is intact to gross touch. Capillary refill is less than 2 seconds. There is very limited motion at the PIP joint secondary to pain.

X-rays of the right long finger were reviewed. They show a chronic fracture-dislocation of the PIP joint of the long finger with evidence of early callus formation. There is persistent dorsal subluxation of the proximal phalanx.

IMPRESSION: Chronic right long finger dorsal PIP joint fracture-dislocation.

PLAN: The diagnosis was explained to the patient and all questions were answered. At this point, he understands this is going to require significant reconstructive surgery and possible eventual fusion of the joint. It was explained that this should be performed by a hand surgeon at this point. Recommendations for hand surgeons will be made to the correctional facility. This referral should be made as soon as possible to prevent further stiffness at that joint. The patient will return to this office on an as needed basis.

Stephen G. Manifold, M.D./CMW

Certificate of Service

I, William A. Newsom hereby certify that I have served a true and correct cop(ies) of the attached Motion For Discovery Upon the following parties/persons:

To: Daniel L. McKenty, esq.
Dana Spring Monzo, esq.
1225 N. King St., Suite 1100
P.O. Box 397
Wilmington, Delaware 19899

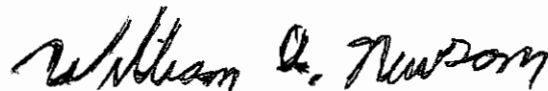
To: U.S. District Court
844 N. King St.
Lockbox 18
Wilmington, Delaware 19801

To:

To:

BY PLACING SAME IN A SEALED ENVELOPE, and depositing same in the United States Mail at the Delaware Correctional Center, Smyrna, DE 19977.

On this 18 day of DECEMBER 2006



1/M WILLIAM A. NEWSOM

SBI# 257317 UNIT V-BUC/B-8

DELAWARE CORRECTIONAL CENTER

1181 PADDOCK ROAD

SMYRNA, DELAWARE 19977



UNITED STATES DISTRICT COURT

844 N. KING STREET

LockBox 18

WILMINGTON, DELAWARE

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